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Hearing Date: September 14, 2011, 2:00 p.m.
Objection Deadline: September 7, 2011, 4:00 p.m.

and

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Attorneys for Plaintiffs

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtor,

TURNBERRY/CENTRA SUB, LLC, TURNBERRY/
CENTRA OFFICE SUB, LLC, TURNBERRY
RETAIL HOLDING, L.P., JACQUELYN SOFFER,
and JEFFREY SOFFER,

Plaintiffs,

v.

LEHMAN BROTHERS HOLDINGS INC. and
LEHMAN BROTHERS BANK, FSB,

Defendants.

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

Adv. Proc. No. 09-01062 (JMP)

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC
STAY AND NOTICE OF HEARING THEREON**

PLEASE TAKE NOTICE that, pursuant to Section 362(d) of Title 11 of the United States Code (the “Bankruptcy Code”), Plaintiffs Turnberry/Centra Sub, LLC, Turnberry/Centra Office Sub, LLC, Turnberry Retail Holding, L.P., Jacquelyn Soffer, and Jeffrey Soffer (collectively “Turnberry”), by their counsel, will move on September 14, 2011 at 2:00 p.m. (the “Hearing”) before the Honorable James M. Peck, United States Bankruptcy Judge for the Southern District of New York (the “Bankruptcy Court”), in Courtroom 601 of the Bankruptcy Court, located at One Bowling Green, New York, New York 10004-1408, for an order in substantially the form of the proposed order annexed hereto as Exhibit A granting Turnberry relief from the automatic stay to litigate all issues in this dispute in one action in Nevada and for the Court to abstain and defer to the Nevada court on the liquidation, adjudication, and allowance of Turnberry’s monetary claims against Lehman Brothers Holdings Inc. and Lehman Brothers Bank, FSB (together as “Lehman”) including setoff, but reserve jurisdiction to provide for the payment of Turnberry’s claim in accordance with the outcome of the Nevada litigation and pursuant to the terms of Lehman’s plan of reorganization once it is confirmed as well as for limited relief from the Case Management Order [Docket No. 9635] to the extent that only fourteen (14) days notice of this Motion be required.

PLEASE TAKE FURTHER NOTICE that pleadings in the adversary proceeding between Turnberry and Lehman are available through the Court’s website at www.nysb.uscourts.gov under the Adversary Proceeding No. 09-01062 (JMP).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must be in writing, conform to the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the Southern District of

New York, and must be filed and served so as to be received no later than September 7, 2011 at 4:00 p.m. (the "Objection Deadline") by the undersigned counsel for Turnberry.

PLEASE TAKE FURTHER NOTICE that pursuant to the Case Management Order and General Order M-182, any objection filed by parties with legal representation shall be filed on or before the Objection Deadline (i) through the Court's Electronic Case Filing System ("ECF") which may be accessed at the Bankruptcy Court's internet website at www.nysb.uscourts.gov, in Portable Document Format ("PDF") readable by Adobe Acrobat or an equivalent program.

PLEASE TAKE FURTHER NOTICE that any party that is either without legal representation or that is unable to file documents electronically shall file its objection on or before the Objection Deadline on a 3.5 inch disk, preferably in PDF, Microsoft Word or any other Windows-based word processing format.

PLEASE TAKE FURTHER NOTICE that a hard copy of any objection must be delivered to the Chambers of the Honorable James M. Peck, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned to a future date and/or time in open court without further notice.

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Respectfully submitted, this 30th day of August, 2011,

RICHARD AND RICHARD, P.A. Dennis Richard, Esq. Michael Tolley, Esq. 825 Brickell Bay Drive Tower III, Suite 1748 Miami, Florida 33131 Telephone: (305) 374-6688 Facsimile: (305) 374-0384 E-mail: dennis@richardandrichard.com <i>Attorneys for Plaintiffs</i>	MEISTER, SEELIG & FEIN, LLP By: <u>/s/ Christopher J. Major</u> Stephen B. Meister, Esq. Christopher J. Major, Esq. Two Grand Central Tower 140 E. 45 th Street, 19 th Floor New York, New York 10017 Telephone: (212) 655-3500 Facsimile: (212) 655-3535 E-mail: sbm@msf-law.com cjm@msf-law.com <i>Attorneys for Plaintiffs</i>
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of August, 2011, the above and foregoing pleading was filed electronically using the Court's CM/ECF system, which will cause a notice of the electronic filing to be served on all CM/ECF participants and by serving all parties on the Master Service List via email. In addition, I served true hard copies of the foregoing by FedEx overnight delivery, addressed to the following:

Hon. James M. Peck
U.S. Bankruptcy Court
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One Bowling Green, Rm 601
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Attn: Andy Valez-Rivera, Esq.
Paul Schwartzberg, Esq.
Brian Masumoto, Esq.
Linda Riffkin, Esq.

By: /s/ Christopher J. Major
Christopher J. Major, Esq.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtor,

TURNBERRY/CENTRA SUB, LLC, TURNBERRY/
CENTRA OFFICE SUB, LLC, TURNBERRY
RETAIL HOLDING, L.P., JACQUELYN SOFFER,
and JEFFREY SOFFER,

Plaintiffs,

v.

LEHMAN BROTHERS HOLDINGS INC. and
LEHMAN BROTHERS BANK, FSB,

Defendants.

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

Adv. Proc. No. 09-01062 (JMP)

PROPOSED ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

Upon the motion of Plaintiffs Turnberry/Centra Sub, LLC, Turnberry/Centra Office Sub, LLC, Turnberry Retail Holding, L.P., Jacquelyn Soffer, and Jeffrey Soffer (collectively “Turnberry”), pursuant to Section 362(d) of Title 11 of the United States Code (the “Bankruptcy Code”), for an order granting Turnberry relief from the automatic stay to litigate all issues in this dispute in one action in Nevada and to defer to the Nevada court on the liquidation, adjudication, and allowance of Turnberry’s monetary claims against Lehman Brothers Holdings Inc. and Lehman Brothers Bank, FSB (together as “Lehman”) including setoff, but reserve jurisdiction to provide for the payment of Turnberry’s claim in accordance with the outcome of the Nevada litigation and pursuant to the terms of Lehman’s plan of reorganization once it is confirmed as well as for limited relief from the Case Management Order [Docket No. 9635] to the extent that

only fourteen (14) days notice of this Motion be required (the “Motion”), and upon all pleadings, arguments and proceedings had herein; it is hereby

ORDERED that the Motion was properly filed and notice was proper and adequate; and it is hereby further

ORDERED that Turnberry is granted relief from the automatic stay to litigate all issues in this dispute in one action in Nevada; and it is hereby further

ORDERED that the Court will abstain and defer to the Nevada court on the liquidation, adjudication, and allowance of Turnberry’s monetary claims against Lehman including setoff, but reserve jurisdiction to provide for the payment of Turnberry’s claim in accordance with the outcome of the Nevada litigation and pursuant to the terms of Lehman’s plan of reorganization once it is confirmed.

THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE